

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

TERRI PECHNER-JAMES and SONIA )  
FERNANDEZ, )  
Plaintiffs, )  
v. )  
CITY OF REVERE, THOMAS AMBROSINO, )  
MAYOR, CITY OF REVERE POLICE )  
DEPARTMENT, TERRENCE REARDON, )  
CHIEF OF POLICE, BERNARD FOSTER, )  
SALVATORE SANTORO, ROY COLANNINO,)  
FREDERICK ROLAND, THOMAS DOHERTY,)  
JOHN NELSON, JAMES RUSSO, MICHAEL )  
MURPHY and STEVEN FORD, )  
Defendants, )  
C.A. No. 03-12499-MLW

**AFFIDAVIT OF WALTER H. PORR, JR., IN SUPPORT OF  
OPPOSITION TO MOTION TO COMPEL**

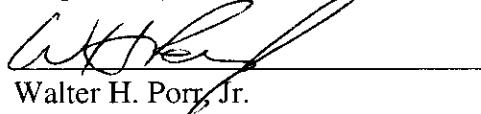
I, Walter H. Porr, Jr., do hereby depose and state:

1. I am an Assistant City Attorney for the City of Revere and have been so employed since December 13, 2004. I am an attorney of record for Defendants, City of Revere, City of Revere Police Department, Mayor Thomas Ambrosino and Chief of Police Terence Reardon in this action. I was responsible for the preparation and filing of the interrogatories propounded by the City of Revere to both Plaintiffs, the motions for summary judgment and the separate statements of undisputed material facts for both the Mayor and the Chief of Police.

2. Plaintiffs' Counsel's only effort to confer regarding the issues raised by the instant motion was a brief telephone call in early to mid-March wherein he stated he disagreed with Defendants' position as set forth in their discovery responses and would be sending a letter outlining his reasons why in the near future. No such letter was forthcoming and I first learned of the motion when the service copy was received in the mail on Thursday, April 14, 2005 and I was notified electronically of its filing by PACER that same day.

Signed under the pains and penalties of perjury this 15 day of April, 2005.

Respectfully submitted,

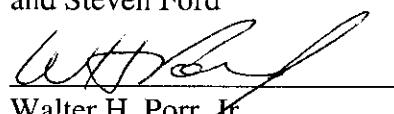
  
Walter H. Porr, Jr.

**CERTIFICATE OF SERVICE**

I, Walter H. Porr, Jr., Assistant City Solicitor and counsel of record for the Defendants, City of Revere, City of Revere Police Department, Mayor Thomas Ambrosino and Police Chief Terence Reardon, hereby certify that I have, this day forwarded a copy of the foregoing Affidavit of Walter H. Porr, Jr., in Support of Opposition to Plaintiffs' Motion to Compel, to all parties herein by mailing same, this date, via first class mail, postage prepaid to:

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Roy Colannino, Frederick Roland,  
Thomas Doherty, John Nelson,  
James Russo, Michael Murphy,  
and Steven Ford

  
\_\_\_\_\_  
Walter H. Porr, Jr.,

Dated: April 15<sup>th</sup>, 2005